Audit of Timber Harvesting and Road Construction, Maintenance, and Deactivation

Forest Licence A19207
Prettys' Timber Co. Ltd.

December 1998

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A. Report from the Board

This is the Forest Practices Board's report on a compliance audit[1] of Forest Licence A19207[2] held by Prettys' Timber Co. Ltd. (Prettys'). Activities under this licence took place in operating areas on the east and west sides of Harrison Lake and to the north and south of the Coquihalla Highway, east of Hope (see map).

The audit examined Prettys' timber harvesting, road practices, and related operational plans, for the period August 1, 1996 to September 22, 1997. The audit assessed compliance with the *Forest Practices Code of British Columbia Act* and related regulations (the Code).

The Board's conclusions are based on an audit of the following forest plans and practices:

- timber harvesting of 16 cutblocks
- operational planning for 10 silviculture prescriptions and six logging plans, some of which related to the above cutblocks
- construction of approximately 44 kilometres of road
- maintenance on 194 kilometres of road
- deactivation of approximately 40 kilometres of road

Prior to completing this report, the Board considered written representations from Prettys' and the district manager of the Chilliwack Forest District, as required by section 182 of the Act.

Conclusions

Prettys' timber harvesting and road construction, maintenance and deactivation practices complied with Code requirements in all significant respects, with the exception of some timber harvesting practices. Specifically, some practices did not comply with Code requirements to maintain riparian reserves, identify and classify streams, and address the risks from wind throw in harvesting operations.

Most of Prettys' road construction and deactivation practices were carried out in steep terrain. These practices were implemented well, with a high level of compliance.

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1 Part B of this document provides background information on the Board's audit program and the process followed by the Board in preparing its report.

2 The report from the auditor (Part C of this document) provides specifics about the operating areas of Forest Licence A19207, the forest planning and field activities of Prettys' Timber Co. Ltd. that were the subject of this audit, and the audit findings.

In two riparian reserve zones, trees were cut adjacent to a stream and a wetland where riparian reserves were required. Three small, low-gradient streams in other blocks were incorrectly classified as non-fish streams. In the absence of a fish inventory, the Code requires that these streams be considered fish streams. In three cutblocks, numerous small streams were not identified. In one cutblock, yarding damaged a wetland and trees located within a wildlife tree patch.

Riparian reserve zone: an area next to a stream, wetland or lake where harvesting of trees is not normally permitted. These reserves are required on some classes of fish streams.

Prettys' also did not adequately address the risks from wind throw in planning harvesting operations. Nine of the 14 cutblocks examined either had wind throw, or a high risk of future wind throw, along the cutblock boundaries. In several of these cutblocks, the boundaries were located adjacent to streams or wetlands, steep sidewalls or unstable areas where wind throw could cause environmental damage through the exposure of mineral soil, stream diversion and sedimentation.

Prettys' has advised the Board that, since the audit it has undertaken actions, where possible, to address the non-compliance identified in the audit, and has:

- conducted fish inventories and determined that the streams classified as non-fish streams did not have fish and could be classified as non-fish streams
- located the streams that were missed in three cutblocks and amended the silviculture prescriptions and logging plans to show the streams
- amended the boundaries of one cutblock to avoid a high wind throw risk identified during the audit

Recommendations

The Board recommends that Prettys' Timber continue to implement procedures to ensure that harvesting practices near streams and wetlands comply with Code requirements and protect those features from impacts associated with timber harvesting and wind throw. These procedures should include:

- mapping streams in operational plans
- conducting fish inventories on low gradient streams before classifying them as non-fish streams
- planning harvesting operations to protect riparian reserves, wetlands and wildlife tree patches
- implementing operational procedures to reduce the risks and impacts on forest resources caused by wind throw on cutblock boundaries

Two Other Issues Arising from the Audit:

Two other issues were identified in the audit within Prettys' operations under Forest Licence A19207. These do not represent non-compliance with Code requirements on the part of Prettys'

Timber, but do identify significant forest management problems that exist within the operating areas of Prettys' licence.

a. Responsibility for Maintenance of Forest Service Roads

The audit identified concerns with road maintenance on two forest service roads—the West and East Harrison Roads—which Prettys' uses under road use permits issued by the Ministry of Forests. A lack of clarity in maintenance responsibilities between Prettys' and the Ministry of Forests resulted in inadequate inspection and maintenance. This contributed to slope erosion and sedimentation of fish streams.

In the Board's opinion, the Ministry of Forests is responsible for ensuring the adequacy of inspection and maintenance on all forest service roads. Section 54 of the Code requires that industrial users of forest service roads on Crown lands be authorised under the appropriate permits. In the Board's opinion, these permits should clearly define the maintenance responsibilities of the permit holder to ensure that the required inspection and maintenance activities are conducted. On these two roads, Prettys' was the primary industrial user of the roads but the permits did not clearly set out the maintenance activities that Prettys' was required to undertake.

Since the audit, Prettys' and the Chilliwack Forest District have taken a number of actions to clarify the inspection and maintenance responsibilities. Both permits have been amended and reissued and now clearly define Prettys' inspection and maintenance responsibilities under the Code. In addition, the amended permit for the West Harrison Road better reflects Prettys' operating area, and relieves them of maintenance responsibility during periods when they are not using the road.

The Chilliwack Forest District has advised the Board that it will consider measures to address the erosion and sedimentation problems identified by the audit on these roads.

The new road permit issued to Prettys' for the East Harrison Forest Service Road requires that Prettys' send the district manager an agreement with two other road users to ensure adequate inspection is carried out and maintenance is performed and paid for in an equitable manner. To date, Prettys' has not met this requirement.

b. Old Roads Located in Prettys' Operating Areas

The audit also identified several deteriorating old road systems within Prettys' area of operation that are beginning to cause, or have caused, significant harm to the environment. Large amounts of sediment have been deposited directly into fish streams, or their tributaries, from the old roads in the Bear Creek, Hut Creek, Cogburn Creek, North Fork of Cogburn Creek and Twenty Mile Creek areas.

These roads were built and used before the introduction of the Forest Practices Code and Prettys' has not used these roads since the Code came into effect. Although they remain on Prettys' road permit, Prettys' does not have a responsibility under the Code to maintain or deactivate the roads.

As no party has a legal responsibility to deactivate or rehabilitate the roads and prevent the significant harm to the environment that is beginning to occur, the Board brought the situation to the attention of the Chilliwack Forest District.

Since the audit, the Chilliwack Forest District has conducted a review of these roads. The district agrees with the Board that there are obvious problems with the condition of the old roads in this operating area but does not agree with the auditors' opinion that significant damage is occurring. The district has advised the Board that development of a restoration plan is underway in Cogburn Creek watershed, but that most of the roads identified by the Board are not a high priority for the limited rehabilitation and deactivation funds available. The district advised the Board that 23 other watersheds in the district have an equal or higher priority for limited rehabilitation and deactivation funds, and that another 25 watersheds of high priority are also potential restoration projects to address problems with old roads.

Given the relatively low priority placed on these roads because of limited funding, the Board concludes that, with the exception of work in the Cogburn Creek area, it is unlikely that rehabilitation work will occur on the roads in Prettys' operating area in the near future.

The Board believes that these old roads are a significant problem in this operating area and within the Chilliwack Forest District generally. They require serious attention by senior levels of government.

The Board will advise the Ministers of the significance of this problem and request to be advised of actions planned to address it.

Keith Moore
Chair

December 9, 1998

B. Forest Practices Board Compliance Audit Process

Background

The Forest Practices Board conducts audits of government's and agreement holder's compliance with the *Forest Practices Code of British Columbia Act* and regulations (the Code). The Board is given the authority to conduct these periodic independent audits by section 176 of the Act. Compliance audits examine forest planning and practices to determine whether or not they meet Code requirements.

The Board undertakes both "limited scope" and "full scope" compliance audits. A limited scope audit involves the examination of selected forest practices (e.g. roads, or timber harvesting, or silviculture) and the related operational planning activities. A full scope audit examines all operational planning activities and forest practices.

The Board determines how many audits it will conduct in a year, and what type of audits (limited or full scope), based on budget and other considerations. The Board audits agreement holders who have forest licences or other tenures under the *Forest Act* or the *Range Act*. The Board also audits government's Small Business Forest Enterprise Program (SBFEP) which is administered by Ministry of Forests district offices. Selection of agreement holders and district SBFEPs for audit is done randomly, using a computer program, to ensure a fair, unbiased selection of auditees.

Audit Standards

Audits by the Forest Practices Board are conducted in accordance with the auditing standards developed by the Board. These standards are consistent with generally accepted auditing standards.

The audits determine compliance with the Code based on criteria derived from the *Forest Practices Code of British Columbia Act* and its related regulations. Audit criteria are established for the evaluation or measurement of each practice required by the Code. The criteria reflect judgments about the level of performance that constitutes compliance with each requirement.

The standards and procedures for compliance audits are described in the Board's "Reference Manual — Compliance Audits, Version 3, May 1998".

Audit Process

Conducting the Audit

Once the Board selects an audit and decides on the scope of the audit (limited scope or full scope), the staff and resources required to conduct the audit and the period covered by the audit are determined. Board staff also meet with the party being audited to discuss the logistics of the audit before commencing the work.

All the activities carried out during the period subject to audit are identified. This includes activities such as the sites harvested or replanted and road sections built or deactivated during the audit period. The items that comprise each forest activity are referred to as a "population." For example, all sites harvested form the "timber harvesting population." All road sections constructed form the "road construction population". The populations are then sub-divided based on factors such as the characteristics of the sites and the potential severity of the consequences of non-compliance on the sites.

The most efficient means of obtaining information to conclude whether there is compliance with the Code is chosen for each population. Because of limited resources, sampling is usually relied upon to obtain audit evidence, rather than inspecting all activities.

Individual sites and forest practices within each population have different characteristics, such as the type of terrain or type of yarding. Each population is divided into distinct sub-populations on the basis of common characteristics (e.g. steep ground vs. flat ground). A separate sample is selected for each population (e.g. the cutblocks selected for auditing timber harvesting). Within each population, more audit effort (i.e. more audit sampling) is allocated to the sub-population where the risk of non-compliance is greater.

Audit work in the field includes assessments from helicopters and intensive ground procedures such as the measurement of specific features like road width. The audit teams generally spend two to three weeks in the field.

Evaluating the Results

The Board recognizes that compliance with the many requirements of the Code is more a matter of degree than absolute adherence. Determining compliance requires the exercise of professional judgment within the direction provided by the Board.

Auditors collect, analyze, interpret and document information to support the audit results. The audit team, comprised of professionals and technical experts, first determines whether forest practices are in compliance with Code requirements. For those practices considered to not be in compliance, the audit team then evaluates the degree to which the practices are judged not in compliance. The significance of the non-compliance is determined based on a number of criteria

including the magnitude of the event, the frequency of its occurrence, and the severity of the consequences.

As part of the assessment process, auditors categorize their findings into the following levels of compliance:

Compliance — where the auditor finds that practices meet Code requirements.

Not significant non-compliance — where the auditor, upon reaching a non-compliance conclusion, determines that a non-compliance event, or the accumulation and consequences of a number of non-compliance events, is not significant and is not considered worthy of reporting.

Significant non-compliance — where the auditor determines that the event or condition, or the accumulation and consequences of a number of non-compliance events or conditions, is significant and is considered worthy of reporting.

Significant breach — where the auditor finds that significant harm has occurred or is beginning to occur to persons or the environment as a result of the non-compliance. A significant breach can also result from the cumulative effect of a number of non-compliance events or conditions.

Identification of a possible significant breach requires the auditor to conduct tests to confirm whether or not there has been a breach. If it is determined that a significant breach has occurred, the auditor is required by the *Forest Practices Board Regulation* to immediately advise the Board, the party being audited, and the Ministers of Forests, Energy & Mines, and Environment, Lands & Parks.

Reporting

Based on the above evaluation, the auditor then prepares the "Report from the Auditor" for submission to the Board. The party being audited is given a draft of the report before it is submitted to the Board so that the party is fully aware of the findings. The party is also kept fully informed of the audit findings throughout the process, and is given opportunities to provide additional relevant information and to ensure the auditor has complete and correct information.

Once the auditor submits the report, the Board reviews it and determines whether any party or person is potentially adversely affected by the audit findings. If so, the party or person must be given an opportunity to make representations before the Board decides the matter and issues a final report to the public and government. The representations allow potentially adversely affected parties to present their views to the Board.

At the discretion of the Board, representations may be written or oral. The Board will generally offer written representations to potentially adversely affected parties, unless the circumstances strongly support the need for an oral hearing.

The Board then reviews both the report from the auditor and the representations before preparing its final report which includes the Board's conclusions and may also include recommendations, if appropriate.

If the Board's conclusions or recommendations result in newly adversely affected parties or persons, additional representations would be required.

Once the representations have been completed, the report is finalized and released: first to the auditee and then to the public and government.

C. Report from the Auditor

1. Introduction

As part of the Forest Practices Board's 1997 compliance audit program, Forest Licence A19207 was selected for audit from the population of major forest licences within the Vancouver Forest Region. The licence, held by Prettys' Timber Co. Ltd., was selected randomly and not on the basis of location or level of performance.

Forest licence A19207 is within the Fraser Timber Supply Area. It comprises four distinct operating areas, that are located within the Chilliwack Forest District, as shown on the attached map and described below.

- west side of Harrison Lake including Trio and Davidson Creeks.
- east side of Harrison Lake including Cogburn, North Fork, Charles, Settler and Talc Creeks.
- north of the Coquihalla highway, east of Hope, in the Deneau/Ladner Creeks area.
- south of the Coquihalla highway, east of Hope, in the Sowaqua and Ghostpass Creeks area.

The Licence has an allowable annual cut of 168,641 cubic metres. The amount of timber harvested during the audit period was about 50% of the allowable annual cut, because of the deferral of timber harvesting in areas being assessed for spotted owl.

2. Audit Scope

The audit examined the planning and field activities related to timber harvesting and road construction, maintenance and deactivation. These activities were assessed for compliance with the *Forest Practices Code of British Columbia Act* and related regulations (the Code), including the transitional provisions of the Code.

All timber harvesting, road construction and deactivation, and road maintenance obligations for the period August 1, 1996, to September 22, 1997, were included in the scope of the audit. This involved examining all aspects of operational planning - such as forest development plans[1], silviculture prescriptions[2] and logging plans[3] - that supported the activities examined during the audit period and included:

- operational plans *approved and implemented* in the period;
- operational plans that were *developed and/or approved and implemented before* the audit period; and
- operational plans *approved during the audit period* and not yet implemented (e.g., timber harvesting had not commenced).

Operational plans that were approved during the audit period include 10 silviculture prescriptions and six logging plans. Three of these silviculture prescriptions and all six of the logging plans supported field activities carried out during the audit period. Three silviculture prescriptions that were approved in the audit period were not yet implemented.

The field activities carried out during the audit period, and therefore subject to audit, are described below:

- the harvesting of 16 cutblocks
- the construction of 21 road sections totaling 43.6 kilometres
- the maintenance of approximately 194 kilometres of road, involving activities such as surfacing and the cleaning of culverts
- the deactivation of 18 road sections totaling 35.9 kilometres of road

Section 3 describes the results of the audit. The Board's audit reference manual, "*Reference Manual - Compliance Audits, Version 2.0, May 1997*", sets out the standards and procedures that were used to carry out this audit.

3. Audit Findings

A. Planning and practices examined

The audit included a review of six silviculture prescriptions and six logging plans approved during the audit period, of which three silviculture prescriptions and six logging plans were examined as part of the timber harvesting practices described below.

The audit work on selected roads and cutblocks included assessments from the air using helicopters and ground-based procedures. The audit examined:

- timber harvesting practices on 14 cutblocks
- the construction of 16 road sections totaling 21.4 kilometres
- the maintenance of 53.9 kilometres of road
- the deactivation of 11 sections of road totaling 20.5 kilometres

B. Findings

The audit found that Prettys' Timber's forest planning and practices related to road construction, maintenance, and deactivation complied, in all significant respects, with Code requirements.

In the area of timber harvesting, the audit found that with the exception of the significant non-compliance described below, the forest planning and practices of Prettys' Timber complied with Code requirements for timber harvesting. The significant non-compliance identified by the audit relates to:

- inadequate identification and classification of streams and inadequate protection of wetlands and associated features; and
- insufficient consideration of timber blow-down risk.

i) *Inadequate identification and classification of streams and inadequate protection of wetlands and associated features*

Riparian areas are those next to streams, lakes and wetlands. These areas contain a high number of the plant and animal species found in the forest, including critical habitat and travel corridors for wildlife. Riparian vegetation protects water quality, stabilizes banks, and is essential to aquatic ecosystems. Many of the organisms found in overhanging vegetation and bordering trees are food for fish.

The Code's objectives for riparian areas are to minimize or prevent impacts of forest use on stream channel dynamics, aquatic ecosystems, and water quality, as well as on the diversity and sustainability of wildlife habitat and vegetation in these areas.

The Code requires the identification and classification of streams and wetlands within and adjacent to areas proposed for logging (cutblocks), with stream classification based on width and the presence or absence of fish and/or gradient.

Under the Code, riparian management areas are established for all streams and wetlands. These consist of a management zone and, for certain larger fish streams and wetlands, a riparian reserve zone. The zones vary in width depending on the stream or wetland classification. Constraints to forest practices apply within these zones, with the reserve zone having the most stringent requirements. Restrictions on the cutting of timber from reserve zones helps maintain the diversity and sustainability of wildlife habitat and vegetation within riparian areas, as well as fish habitat and aquatic ecosystems.

The audit identified the following instances where Prettys' Timber did not adequately protect riparian areas and streams.

- Timber was harvested for approximately 25 metres from the riparian reserve of a stream which the audit determined as an S3 fish stream. The audit determined that the low gradient stream should have been classified under Code requirements as a fish stream because the work required by the Code to confirm the absence of fish was not performed.

Subsequent to the audit and the harvesting of the timber, work by Prettys' Timber has determined the classification of the stream as an S5 non-fish stream, and which would not require a riparian reserve.

The main area of the code to which the non-compliance relates is sections 72 and 73 of the *Operational Planning Regulation*, which establish the classification of streams and the required riparian management areas.

- Cables hanging across a W3 wetland caused striations through the wetland and the breaking of the top of snags that were reserved as a wildlife tree patch within the wetland. No trees were actually yarded through the wetland.

  The main area of the code to which the non-compliance relates is section 33(3)(g) of the operational planning regulation, which requires appropriate measures to be used including felling, yarding and debris management adjacent to wetlands.

- Numerous S6 streams on 3 cutblocks were not identified, classified or mapped. These streams were all less than 1.5 meters in width. In one of the cutblocks that was not yet harvested, an S4 fish stream was not identified, classified or mapped. The unidentified S4 stream was deemed to be a fish stream because of low gradient.

  Once the audit identified the streams, Prettys' Timber undertook immediate work to amend the approved plans to show the streams. No changes to harvest strategy resulted from the identification of the small streams. Work subsequent to the audit by Prettys' Timber determined that the unidentified S4 fish stream should be classified as a non-fish stream.

  The main area of the code to which the non-compliance relates is sections 39(3)(b) and 33(3)(b) of the *Operational Planning Regulation*, which require streams to be described and classified in the plans.

- Three low gradient streams were classified in the plans as non-fish bearing. As sufficient work was not undertaken to confirm the absence of fish, these streams should have been classified as fish streams.

  Subsequent to the audit and some harvesting of timber, work by Prettys' Timber has determined that the streams do not contain fish.

  The main area of the code to which the non-compliance relates is sections 72 and 73 of the *Operational Planning Regulation,* which establish the classification of streams.

- Timber harvesting occurred within the riparian reserve zone of a W1 wetland for approximately 25 metres.

The main area of the code to which the non-compliance relates is section 96 of the Act relating to unauthorized timber harvesting.

ii) *Insufficient consideration of timber blow-down risk*

The audit identified that Prettys' Timber has not adequately addressed the risk to timber from blow-down. Section 40 of the *Operational Planning Regulation* requires that in the evaluation for forest health factors, which includes abiotic factors involving wind, treatments must be proposed that are designed to reduce the future risk to resource values.

The majority of the cutblocks with harvesting activities either experienced some level of blow-down or the risk of blow-down was high. Most of these involved block boundaries located adjacent to steep sidewalls, natural slide areas, or riparian management areas where the risk of blow-down is greater. A review of some of the blocks that have boundary locations marked, but which have not yet been harvested, indicates that the risk of blow-down is not being addressed.

4. Other issues

The audit also identified a lack of clear maintenance responsibilities on the forest service roads that Prettys' Timber shares with other users, which presents an increased risk of harm to persons or the environment.

Additionally, certain "old roads" included on the road permit held by Prettys' Timber have caused significant harm to the environment because they have not been either properly maintained or deactivated. As these roads have not been used since the Code came into effect on June 15, 1995, Prettys' Timber does not have responsibility for the maintenance and deactivation of these roads. If Prettys' Timber had been responsible, the audit would have assessed the situation as a significant breach.

The situations described in this section are not considered to be non-compliance by Prettys' Timber. They are included in this report because of the significant concerns associated with both situations.

i) *Maintenance of forest service roads*

On the West and East Harrison forest service roads where Prettys' Timber is designated as the primary user, it is not clear how maintenance work is divided amongst the road use permit holders.

The West Harrison forest services road has not been inspected formally by Prettys' Timber since April 12, 1996. Other road users, including the Ministry of Forests are undertaking maintenance work on an ad-hoc basis, and usually only as funding permits.

The lack of clarity about maintenance responsibilities increases the potential risk of harm to persons or to the environment. Examples of issues arising from the lack of clarity for maintenance responsibilities are described below.

- A section of the West Harrison forest service road is shown on the road use permit map as a responsibility of Prettys' Timber. This includes a portion which extends well past Prettys' Timber operating area, and which the company has not maintained. In this location, slope erosion has resulted in a safety hazard.

- Cut slope rehabilitation on Hale Creek by the Ministry of Forests resulted in sediment deposition into this fish stream.

ii) *Old Road Systems in Prettys' Operating Areas - significant harm to the environment*

The deteriorating condition of many of the roads used by Prettys' Timber before the introduction of the Code was identified as a problem. The roads were built and used before the introduction of the Forest Practices Code and remain on active road permit R01712 issued to Prettys' Timber by the Ministry of Forests. Prettys' Timber has been attempting to get the roads removed from their road permit and to obtain funds from Forest Renewal British Columbia to address the environmental issues.

An obligation to maintain or deactivate the roads under section 63 and 64 of the Act is not addressed by the Code because Prettys' Timber has not used these roads since the Code's introduction. If such an obligation existed, the audit would have assessed the situation as a significant breach because significant harm to the environment is beginning to occur.

The roads, which are in Bear Creek, North Fork, Hut Creek, Cogburn Creek, and Twenty Mile Creek areas, have deteriorated and are beginning to cause, or have caused, significant harm to the environment. The harm to the environment is a result of the large amounts of sediment from the deteriorating roads being deposited directly into fish streams or into streams that flow directly into fish streams.

5. Audit Opinion

In my opinion, except for the significant non-compliance described below, the timber harvesting and road construction, maintenance and deactivation activities carried out by Prettys' Timber Co. Ltd. on Forest Licence A19207 from August 1, 1996, to September 22, 1997, were in compliance, in all significant respects, with the road and harvesting requirements of the Code as of August 1997.

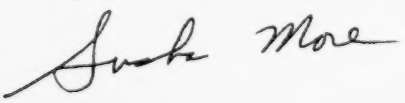
As described in section 3, the audit found that the harvesting practices of Prettys' Timber did not adequately identify and classify streams and did not adequately protect wetlands and associated features. Also, the timber harvesting practices do not adequately consider the risk to timber from blow down. The significant non-compliance was neither sufficiently pervasive nor of sufficient magnitude to warrant an overall negative opinion.

In reference to compliance, the term "in all significant respects" recognizes that there may be minor instances of non-compliance that either may not be detected by the audit, or that were detected but not considered worthy of inclusion in the audit report.

Without further qualifying my opinion, I also draw attention to the situations described in section 4. These situations were not considered to be non-compliance by Prettys' Timber and are summarized below.

- The responsibility for maintenance on forest service roads used by Prettys' Timber and multiple users is not clear, and in one situation the lack of clarity has resulted in a safety hazard while in another sediment was deposited into a fish creek.
- The condition of old roads that remain on a road permit held by Prettys' Timber is deteriorating. As these roads were constructed and used before the introduction of the Code, and have not been used since, Prettys' Timber does not have a legal obligation under the Code to maintain or deactivate these roads. However, significant harm to the environment is either beginning to occur or has occurred as a result of large amounts of sediment being deposited into fish streams or streams that flow directly into fish streams.

Sections 2 and 3 of this report from the auditor describe the basis of the audit work performed in reaching this qualified opinion. The audit was conducted in accordance with the auditing standards of the Forest Practices Board. Such an audit includes examining sufficient road and timber harvesting practices to support an overall evaluation of compliance with the Code.



Sucha More, CA
Auditor
Forest Practices Board

Victoria, British Columbia
September 16, 1998

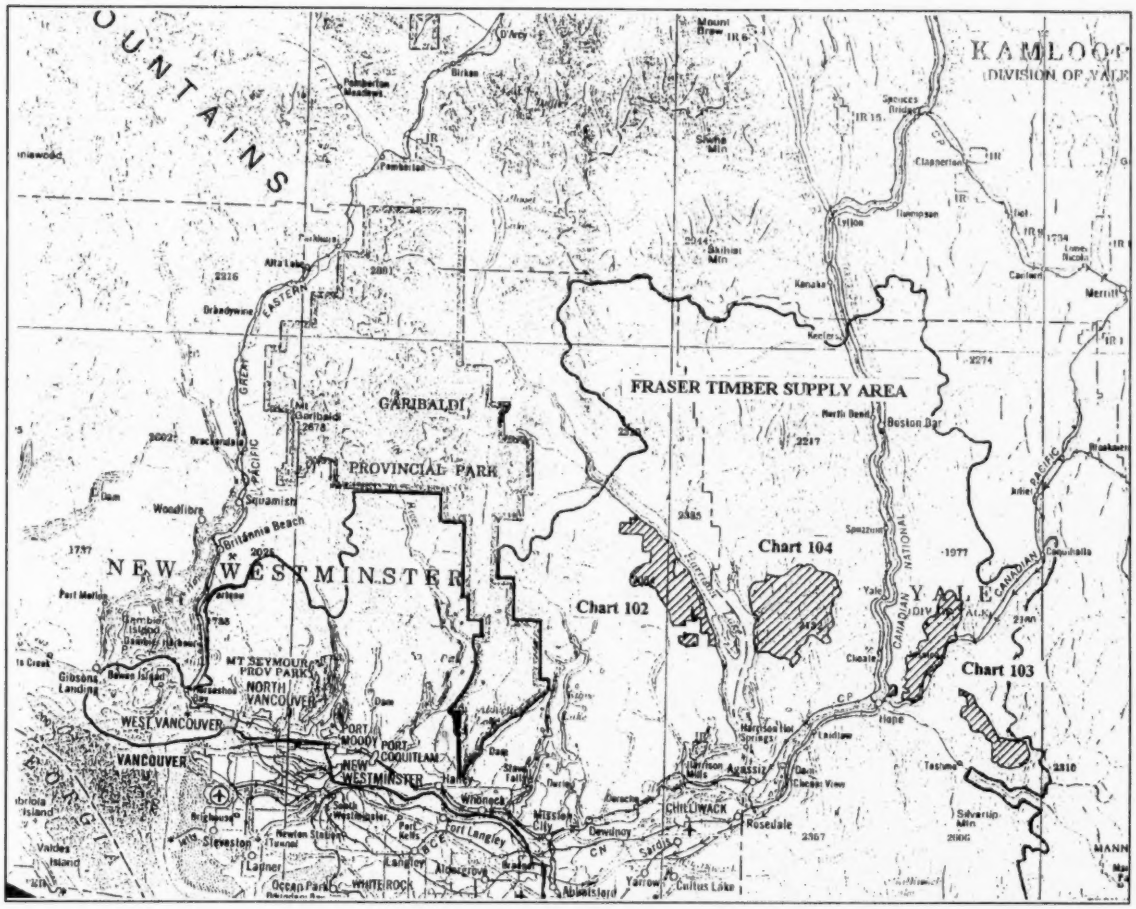
Endnotes

[1] A forest development plan is an operational plan which provides the public and government agencies with information about the location and scheduling of proposed roads and cutblocks for harvesting over a period of at least 5 years, except under special circumstances. The plan must specify measures that will be carried out to protect forest resources (including biological diversity, water, fisheries, wildlife and other forest resources). It must also illustrate and describe how objectives and strategies established in higher level plans, where they have been prepared, will be carried out. Site specific plans are required to be consistent with the forest development plan.

[2] A silviculture prescription is a site specific operational plan that describes the forest management objectives for a cutblock (cutblock - a specific area authorized for timber harvesting). It describes the management activities proposed to maintain the inherent productivity of the site, accommodate all resource values including biological diversity, and produce a free growing stand capable of meeting stated management objectives. Silviculture prescriptions must be consistent with higher level plans that encompass the area to which the prescription applies.

[3] A logging plan is an operational plan that details how, when, and where timber harvesting and road construction activities will take place in a cutblock (a specific area authorized for timber harvesting) in accordance with the approved silviculture prescription and forest development plan for the area. Information about other forest resource values, plus all current field information for the area, must be clearly shown in the logging plan.

Forest Licence A19207
Prettys' Timber Co. Ltd.



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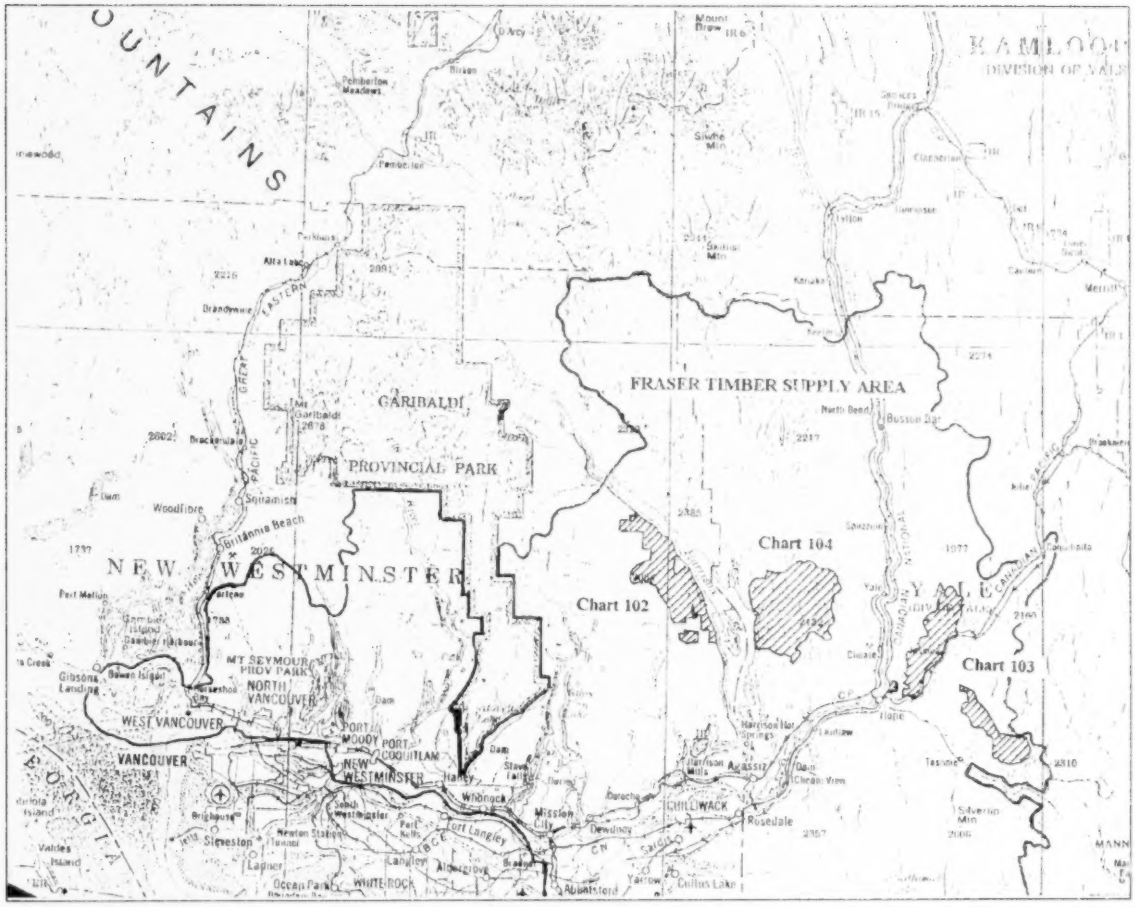

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